

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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MARK BERNSTEIN, individually and as
Parent and Natural Guardian of ADAM
BERNSTEIN, an Infant under the age of
17 years,

Plaintiffs,

-against-

THE VILLAGE OF PIERMONT, MICHAEL
BETTMAN, DANNY GOSWICK, JR. and
SAM KROPP,

Defendants.
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MARK BERNSTEIN, Individually and as
Parent and natural guardian of A. B., an
infant under the age of 17 years,

Plaintiff,

-against-

THE VILLAGE OF PIERMONT,

Defendant.
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S I R S:

PLEASE TAKE NOTICE that upon the Affirmation of Donald J. Feerick, Jr., Esq., dated the 12th day of April, 2013, the exhibits annexed thereto, and the accompanying Memorandum of Law, dated the 12th day of April, 2013, the Defendant Daniel Goswick, Jr., s/h/a Danny Goswick, Jr., will move this Court before the Hon. Edgardo Ramos, U.S.D.J., Judge of the United States District Court for the Southern District of New York, on the 29th day of May, 2013, at 10:00 a.m. on that day, or at such other time as the Court may direct, at the United States Courthouse, 300 Quarropas Street, White Plains, New York, for an Order directing

NOTICE OF MOTION

11-CV-3677 (ER) – **Lead Case**

12-CV-2062 (ER)

Defendant Village of Piermont to provide a defense and indemnity to Defendant Daniel Goswick, Jr., under applicable provisions of Chapter 10 of the Village Code of the Village of Piermont, and for such other and further relief as the Court deems just and proper.

Dated: South Nyack, New York
April 12, 2013

Yours, etc.,

FEERICK LYNCH MacCARTNEY PLLC
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s/h/a Danny Goswick, Jr.
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By: 

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